

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

Holding a Criminal Term

Grand Jury Sworn in on March 3, 2003

UNITED STATES OF AMERICA	:	CRIMINAL NO.	03 - 554
	:		
v.	:	GRAND JURY ORIGINAL	
	:		
JOSE BENITO CABRERA CUEVAS,	:	VIOLATIONS:	
a/k/a Fabian Ramirez,	:		
	:	21 U.S.C. §963	
	:	(Conspiracy to Import Five Kilograms	
NAYIBE ROJAS VALDERAMA	:	or More of Cocaine and to Manufacture	
a/k/a Sonia,	:	and Distribute Five Kilograms or More of	
	:	Cocaine Intending and Knowing that the	
	:	Cocaine Will Be Unlawfully Imported	
	:	into the United States)	
	:		
JOSE ANTONIO CELIS,	:		
a/k/a Calvo,	:	18 U.S.C. §2	
	:	(Aiding and Abetting)	
	:		
JUAN DIEGO GIRALDO,	:	21 U.S.C. §853	
a/k/a Flaco,	:	21 U.S.C. §970	
	:	(Forfeiture)	
Defendants.	:		

FILED IN OPEN COURT

DEC 18 2003

INDICTMENT

THE GRAND JURY CHARGES THAT:

**CLERK, U.S. DISTRICT COURT
DISTRICT OF COLUMBIA**

COUNT ONE

From on or about sometime in 2001, the exact date being unknown to the Grand Jury, and continuing thereafter up to and including the date of the filing of this Indictment, in the Republic of Colombia and elsewhere, **JOSE BENITO CABRERA CUEVAS, a/k/a Fabian Ramirez,**

NAYIBE ROJAS VALDERAMA, a/k/a Sonia, JOSE ANTONIO CELIS, a/k/a Calvo, and JUAN DIEGO GIRALDO, a/k/a Flaco, did unlawfully, knowingly and intentionally combine, conspire, confederate and agree, with co-conspirators not indicted herein, and with others known and unknown to the Grand Jury, to commit the following offenses against the United States: (1) to knowingly and intentionally import five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, into the United States from the Republic of Colombia and elsewhere, in violation of Title 21, United States Code, Sections 952 and 960, and (2) to knowingly and intentionally manufacture and distribute five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, intending and knowing that such substance will be unlawfully imported into the United States, in violation of Title 21, United States Code, Sections 959 and 960.

All in violation of Title 21, United States Code, Sections 963 and 960 and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION

The violation alleged in Count One is realleged and incorporated by reference herein.

As a result of the offense alleged in Count One, the defendants named in Count One shall forfeit to the United States, pursuant to Title 21, United States Code, Sections 853 and 970, any and all respective right, title or interest which such defendants may have in (1) any and all money and/or property constituting, or derived from, any proceeds which such defendants obtained, directly or indirectly, as the result of the violation alleged in Count One of this Indictment; and (2) any and all property used, in any manner or part, to commit, or to facilitate the commission

of, the violation alleged in Count One of this Indictment.

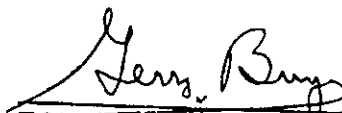
If any of said forfeitable property, as a result of any act or omission of the defendant - -

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the said property.

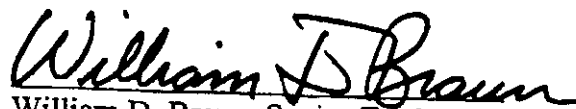
Criminal Forfeiture, in violation of Title 21, United States Code, Sections 853 and 970.

A TRUE BILL:

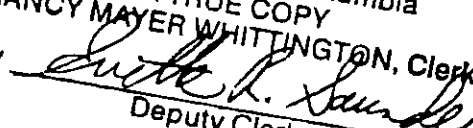

FOREPERSON.

Jodi L. Avergun, Chief
Narcotic and Dangerous Drug Section
Criminal Division
U.S. Department of Justice
Washington, D.C. 20530

By:



William D. Braun, Senior Trial Attorney
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United States District Court
For the District of Columbia
A TRUE COPY
NANCY MAYER WHITTINGTON, Clerk
By 
Deputy Clerk